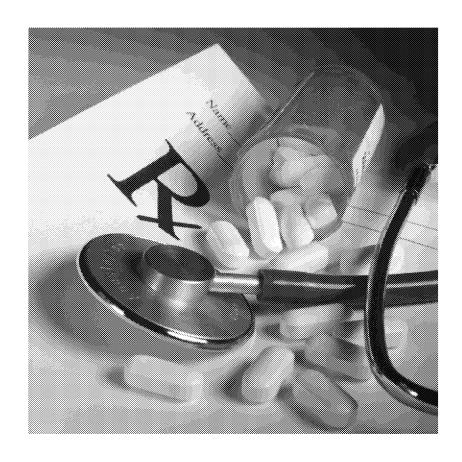
EXHIBIT 32

Regulatory Affairs Update



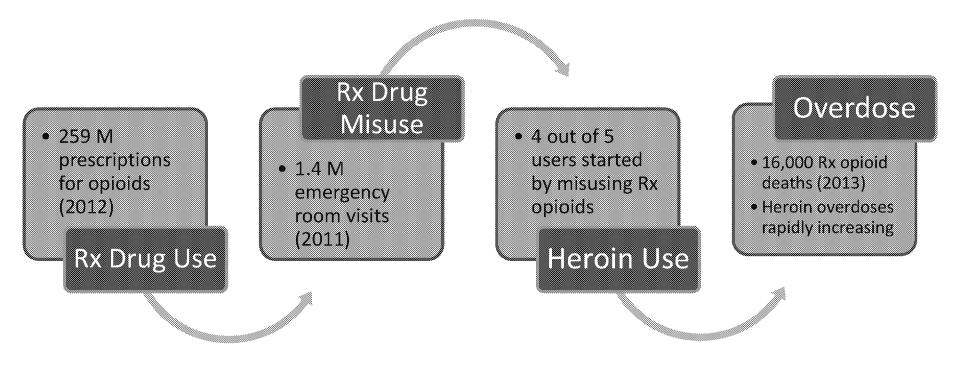
RNA Leadership Team

Nate Hartle, Sr. Director Regulatory Affairs

November 20th, 2015



Addressing Rx Drug Abuse & Heroin Use



The Obama administration recently announced collective public and private sector efforts that focus on provider training, access to medication-assisted treatments and community awareness.

Sources: White House Memorandum for the Heads of Executive Departments & Agencies Re: Addressing Prescription Drug Abuse and Heroin Use, October 21, 2015; DEA National Drug Threat Assessment 2015

Our Program Design – A Regulatory View

Suspicious Order Reporting (21 CFR § 1301.74(b))

Effective Controls Against Diversion (21 U.S.C. § 823)

Order Monitoring

Customer Monitoring

Diversion Monitoring

Amariya

D. Beerlee

Director Tests

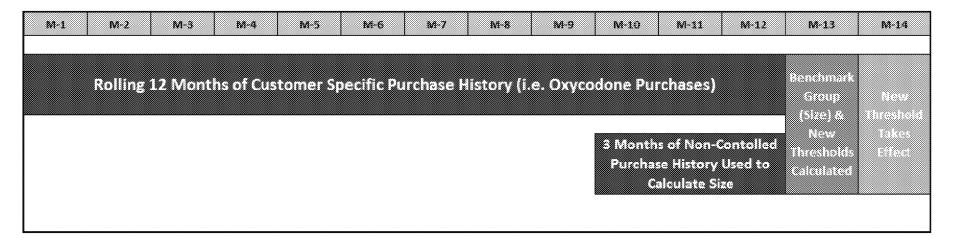
Enhancements to Suspicious Order Reporting

Distributor Responsibility to Identify and Report Suspicious Orders:

"The registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances...Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency."

- Enhance monthly thresholds with a robust statistical model
- Thresholds will adjust based on actual purchases
- ISMC pilot is in process
- Data analysis for chains and health systems is underway
- Implementation is expected throughout 2016

Model uses Actual Customer Purchase Data



- Each month recent customer data is used to assess purchase history and pharmacy size, which both account for variability and growth.
- The proxy for size (benchmark group) is updated monthly.
- Thresholds reset monthly based on new purchasing data (one month lag).

Model calculates Threshold Options and allows for Due Diligence-based Thresholds

1

New model thresholds

Lower of the two is "binding"

Same-Customer

(Customer Purchases)

Benchmark

(Similar Customer Comparison)

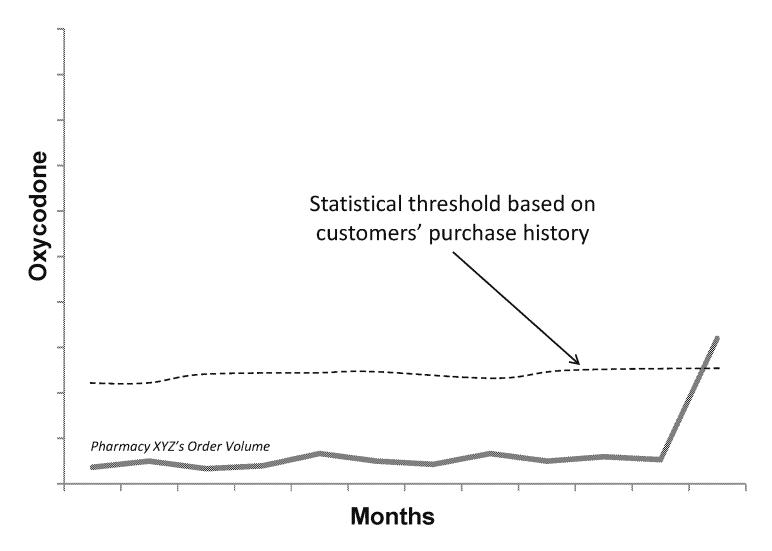
- OR -

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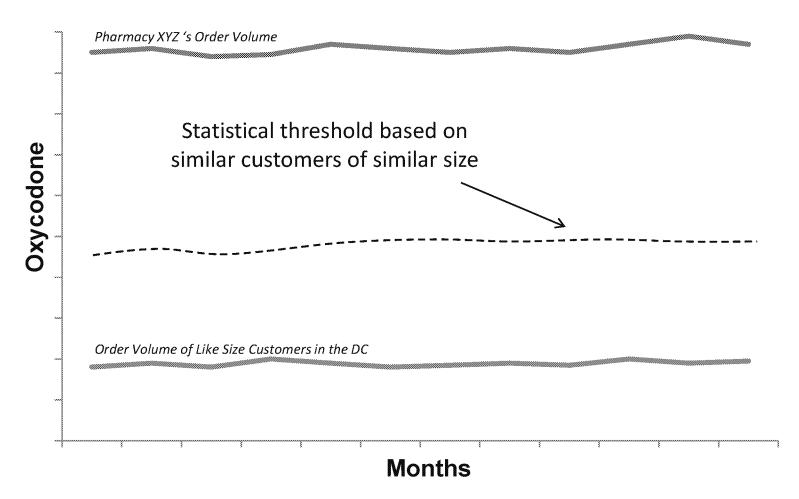
Due Diligence

Based on Regulatory Affairs review

Same Customer Threshold Example

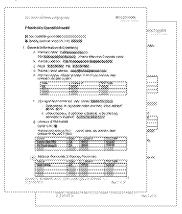


Benchmark Threshold Example

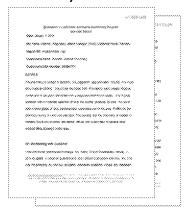


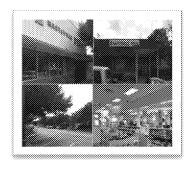
Due Diligence Threshold Example

Questionnaire

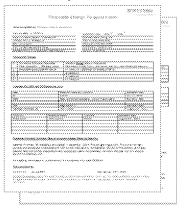


Site Visit/Call





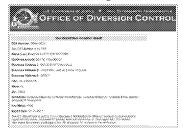
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Licensure & Registration





Next Steps

- Review of pilot results and analysis
- RNA data analysis has been completed and options reviewed
- AGI is re-calculating benchmark groupings
- Implementation plan and timeline will be modified and shared with PGORC/ORC
- Communication plans will be developed to support the rollout

Discussion

